This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0191 INTRODUCTION OF SLA FOR SUPPLIER DE-REGISTRATION ON DISCONNECTED METERS

On 03 April 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0191 Introduction of SLA for Supplier De-Registration on Disconnected Meters.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	12 May 2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	03 April 2025
RESPONSE DEADLINE	29 April 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	<u>Electricity</u> We support the proposed solution for Electric disconnections to add an SLA to send a registration deactivation request. With regards to performance assurance follow up with non-performing Suppliers are there any reporting requirements on the back of this? <u>Gas</u> For Gas although we agree an SLA is required. A 20-day SLA is not suitable within the current Gas process as it stands and there is no query process, it also does not fit the current business and network processes.	Thank you for your comments. The Code Manager has considered this and reduced the scope of the solution to be Electricity only.
Scottish Power Energy Retail (Energy Supplier)	We welcome the Impact Assessment and believe 20 working days should be enough for Suppliers to submit registration de-activation requests or raise queries with relevant DNOs	Thank you for your comments.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Yes, we agree that proposed solution addresses the problem statement for Electric processes but not gas. For the current gas process, following the removal of a meter, the MPRNs remain in a SMP status of Live and a RMP status of Dormant, until the Network Operator physically disconnects at site after 12 months whereby the MPRNs change to a SMP status of Dead and a RMP status of Terminated. During the RMP status of Dormant, there are instances where a reconnection is needed (example payment of bill, following a warrant disconnection or re-installation following building work). In these circumstances, this is made difficult if the Supplier De-Activates the site. Where the RMP status is Terminated, there are occasions where we would want to query and challenge this status. This may involve performing a site visit where the lead time may exceed an SLA of 20 working days.	Thank you for your comments. The Code Manager has considered this and reduced the scope of the solution to be Electricity only.
Scottish Power Energy Retail (Energy Supplier)	Yes, we agree	Thank you for your comments.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	If after 20 working days, a registration deactivation request has not been received. The metering point automatically should be deactivated for electric meter points. We feel the problem statement is relevant for electricity only. Due to the lack of query process within gas and the difference in industry processes, the gas process needs further development.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	n/a	n/a

Question 4:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	The solution appropriately accounts for the move to the new MHHS arrangements. There is an issue with the outstanding electric sites which are disconnected but not deactivated as these cannot be migrated for MHHS which means a data cleanse will need to be completed before MHHS.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	Yes, we agree.	Thank you for your comments.

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	This is not a comment on the legal text change, but on the existing legal text: 4.1.8 within the legal text states a Supplier should either raise PT0042 logical disconnection general query or PT0026 Physical disconnection general query, when disputing a disconnection. However, to reinstate an MPAN, PT0029 Retrospective MPAN amendments (Elec) would be required can this further amendment to the text be included. We feel the current legal text for Gas is mirroring the electric legal text, but as it stands this does not work for the current gas process.	Thank you for your comments. The legal text currently does not reference this as reinstating MPANs is a process defined under the BSC.
Scottish Power Energy Retail (Energy Supplier)	No comments	Thank you for your confirmation.

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Should no data cleanse be required, SSE would require minimal time and would be happy for this to be included within the next release schedule.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We do not require any specific lead times to implement this change	Thank you for your comments.

Question 7:	If there was any data cleanse activity required before the change was implemented, how long would your business require for this? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE would appreciate help with understanding the scale of the data cleanse which is necessary. But we would hope to complete any electric data cleanse by M14.	Thank you for your comments. The REC Performance Assurance team has confirmed they do not expect to do a specific data cleanse for this but will pick it up through routine assurance activity.
Scottish Power Energy Retail (Energy Supplier)	We would require 20 working days to carry out this activity.	Thank you for your comments.

Question 8:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	No, SSE do not foresee any risks to the MHHS implementation.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	The risks would be if the data cleanse activity does not take place. To minimise failures and maximise the success of migration processes, it is essential that the status of each mpxn across the industry is consistently aligned across all participant systems.	Thank you for your comments.

Question 9:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.

RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
SSE Energy Supply (Energy Supplier)	On the assumption this is electric only - B, up to £9,999	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We are not able to provide any cost breakdown at this point.	Thank you for your comments.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE support this solution for electric as it will help ensure our records are kept up to date. But Gas will need further work within the solution.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	While we are currently unable to quantify specific benefits, proper alignment of information across the industry is beneficial and welcomed.	Thank you for your comments.

Question 11:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Yes, SSE support this change for electric. But not for gas.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	Yes, we support the progress and implementation of this change	Thank you for your comments.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE believe that any electric data cleanse required, does not need to be completed before this change is implemented. But will be required before MHHS migration.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have no other comments at this time	n/a